

CHARLTON HESTON'S ARENA PAC

Charlton Heston
Chairman

Tony Makris
Executive Director

December 22, 1998

General Counsel's Office
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20036

RE: MUR 4865

Dear Sir or Madam:

This letter is submitted in response to your letter dated December 7, 1998, regarding a complaint received by your office which seems to allege some wrongdoing on the part of Arena PAC and myself as Treasurer.

I have reviewed the materials which were attached to your letter and have found no allegations which amount to a violation of any of the rules of the Federal Election Commission. The inferences contained in the complaint are merely that and the complainant has offered nothing, either past or present, which requires either a more detailed response or further investigation by the Commission.

Although Mr. Charlton Heston is the Chairman of Arena PAC as well as the President of the NRA, the two organizations are not related in any way. Moreover, the election activities of Arena PAC are not carried out in coordination with the NRA or any political organization sponsored by the NRA. Arena PAC was organized before Mr. Heston became President of the NRA and at a time when Mr. Heston had no relationship with the NRA whatsoever.

I appreciate the opportunity to respond. Please do not hesitate to contact me if additional information is required.

Sincerely,



Barbara Wixon Bonfiglio
Treasurer

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